

1 **SANDRA D. LYNCH, ESQ.**

2 C&A Building, Suite 101  
3 251 Martyr Street  
4 Hagatna, Guam 96910  
5 Telephone: (671) 472-6848  
6 Facsimile: (671) 477-5790  
7 E-mail: [sdlynch@hotmail.com](mailto:sdlynch@hotmail.com)  
8 or [sdl@cbbblaw.net](mailto:sdl@cbbblaw.net)

9 *Attorneys for Alice N. Salas*

**FILED**  
DISTRICT COURT OF GUAM

**MAR 25 2003**

MAKING MORAN  
DISTRICT COURT

53

10  
11 **IN THE UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF GUAM**

13 **ALICE N. SALAS**

14 Plaintiff,

15 vs.

16 **JAMES JI ENTERPRISE,**  
17 **JJ PACIFIC DEVELOPMENT**  
18 **CORPORATION, JAMES JI,**  
19 **and HUANG LEE,**

20 Defendants.

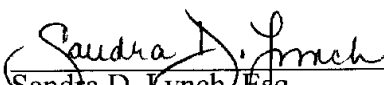
**CIVIL CASE NO. 02-00002**

**DECLARATION OF PLAINTIFF'S  
COUNSEL RE: FEES INCURRED**

21 I, Sandra D. Lynch, do hereby declare and affirm:

- 22 1. I am court appointed counsel for Plaintiff in the above matter and hereby submit  
23 my billing statement for the time expended on behalf of Plaintiff.
- 24 2. The billing statement includes out of pocket expenses incurred for filing, copying,  
25 and serving documents on Plaintiff's behalf.

26 Respectfully submitted this 20<sup>th</sup> day of March, 2003.

27   
28 Sandra D. Lynch, Esq.  
Attorneys for Plaintiff

***Brooks Lynch Tydingco & Quan LLP***

C&A Professional Bldg., Suite 101  
251 Martyr Street  
Hagåtña, Guam 96910

Ph:(671) 472-6848

Fax:(671) 477-5790

District Court of Guam

March 21, 2003

File #: 19188-01

Attention:

RE: DC-Salas, Alice

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Oct-04-01	Review statute re: juror employment	1.00	175.00	SDL
Oct-05-01	Review court schedule from trial re:juror	1.00	175.00	SDL
	Research cases under statute for liability factual situations, employment rights.	3.20	560.00	SDL
Oct-09-01	Confer with client re:status of employment.	0.50	87.50	SDL
Oct-13-01	Draft letter to client re: returning to work.	0.50	87.50	SDL
Oct-29-01	Phone call with client re: work situation, her resignation.	0.40	70.00	SDL
Nov-09-01	Research re: cases of reduced pay/hours compensable, difference in wages & jury fees.	4.00	700.00	SDL
	Meeting with Alice Salas after forced resignation, her rights, timetable for wages, etc.	4.00	700.00	SDL
Nov-12-01	First draft of complaint	2.00	350.00	SDL
	Draft Affidavit of client to accompany complaint.	1.50	262.50	SDL
	Continued Research remedies for client; types of claims.	3.00	525.00	SDL
Feb-07-02	Revise Complaint against James Ji Enterprises.	1.00	175.00	SDL

Mar-18-02	Letter to James Ji confirming offer made.	1.00	175.00	SDL
	Letter to client re: settlement offer from defendant, terms, recommendation.	1.00	175.00	SDL
	Attend Settlement Negotiations with defendant.	1.50	262.50	SDL
Apr-03-02	Meeting with client; prepare re: scheduling.	1.50	262.50	SDL
	Draft Scheduling Order proposal.	1.00	175.00	SDL
Apr-08-02	Revise Scheduling Order.	1.00	175.00	SDL
	Draft letter to James Ji re: schedule for trial.	0.50	87.50	SDL
Apr-15-02	Revise Scheduling Order; phone call to client re: dates to propose.	0.40	70.00	SDL
Apr-16-02	Draft Declaration of Counsel re: Meeting & defense input to Scheduling Order.	0.50	87.50	SDL
May-07-02	Attend court hearing on schedule for trial.	0.50	87.50	SDL
May-09-02	Revise Proposed Scheduling Order after hearing.	0.70	122.50	SDL
	Phone call with client to discuss schedule after hearing.	0.20	35.00	SDL
May-13-02	Review Civil Rules for default procedures.	0.70	122.50	SDL
May-14-02	Research re: default (Federal Civil Rules) documents required.	1.00	175.00	SDL
	Draft Affidavit for Default.	0.70	122.50	SDL
	Draft Motion for Default.	1.20	210.00	SDL
	Review pleadings, documents for default.	0.40	70.00	SDL
May-16-02	Draft proposed judgment for Default.	0.50	87.50	SDL
	Draft Certificate of Service.	0.10	17.50	SDL
	Revise Affidavits re: phone contact.	0.40	70.00	SDL
May-17-02	Finalize Motion for Default Judgment.	0.70	122.50	SDL
	Phone call with client re: final application / default.	0.40	70.00	SDL

May-28-02	Review court order re: name change.	0.20	35.00	SDL
	Revise Complaint to correct "Lee" named defendant.	0.50	87.50	SDL
	Draft Settlement letter to defendants.	1.50	262.50	SDL
	Meeting with Attorney General and CPS to discuss child's drug exposure.	0.50	87.50	SDL
May-31-02	Phone call with defendant re: Stipulation to Amend.	0.20	35.00	SDL
	Draft Stipulation to correct name on Complaint.	0.70	122.50	SDL
	Draft Status report to court.	0.70	122.50	SDL
	Research re: damages, fees, default, hearing procedures.	2.20	385.00	SDL
Jun-04-02	Review Answer by defense.	0.40	70.00	SDL
	Review & compare Answer to Complaint for discovery questions.	0.50	87.50	SDL
	Draft Interrogatories and production requests.	2.50	437.50	SDL
Sep-30-02	Draft letter to defense counsel re: scheduling depositions.	0.70	122.50	SDL
Oct-24-02	Review letter from defense counsel re: deposition schedule; conference with client re: deposition dates.	0.50	87.50	SDL
Nov-15-02	Prepare Notice of Deposition for Mr. Lee.	0.40	70.00	SDL
Nov-21-02	Prepare for deposition.	1.25	218.75	SDL
Nov-22-02	Attend deposition of Alice Salas.	3.00	525.00	SDL
Dec-03-02	Draft letter to Mr. Berman re: Stip & Order for schedule.	0.50	87.50	SDL
Dec-05-02	Review rec'd letter with draft Order & Stipulation from defense.	0.20	35.00	SDL
	Phone call with defense counsel re: schedule.	0.20	35.00	SDL
	Draft fax to defense re: proposal to continue.	0.20	35.00	SDL
Dec-06-02	Revise letter from defense re: Stip & Order, settlement.	0.20	35.00	SDL

	Revise Stipulation and Order for discovery & motions.	0.40	70.00	SDL
Dec-16-02	Draft Stipulation for new scheduling order.	1.00	175.00	SDL
Jan-27-03	Draft letter to defense counsel re: corporate control and schedule depositions.	0.70	122.50	SDL
	Revise (4th) Stipulation and Order re: motions.	0.40	70.00	SDL
	Review Answer to Complaint for admissions as to corporate control.	0.20	35.00	SDL
Jan-30-03	Fax to defense re: depositions of defendant.	0.20	35.00	SDL
Jan-31-03	Letter from defense agreeing to revised Stipulation & Order; Deposition schedule for Mr. Ji.	0.20	35.00	SDL
Feb-17-03	Prepare Ji deposition notice.	0.40	70.00	SDL
Feb-20-03	Depose James Ji; conference with client re: settlement offer.	1.70	297.50	SDL
Mar-01-03	Review rec'd motion from defense counsel to withdraw, proposed Order, declaration.	0.50	87.50	SDL
	Conference with client re: counter-offer to settle, Ji's testimony.	0.50	87.50	SDL
Mar-03-03	Review Scheduling Order, rules regarding Pre-Trial materials.	0.50	87.50	SDL
	Draft statutory language, standards of proof for Pre-Trial memorandum.	1.70	297.50	SDL
	Review cases cited by defense in offer letter, cases re: damages in similar cases for Pre-Trial memo / outline for brief on legal issues.	3.20	560.00	SDL
	Review Order re: Motion to Withdraw, responses due.	0.20	35.00	SDL
Mar-04-03	Phone call with client Ms. Salas regarding offer to propose re: no reinstatement desired, deadline for response.	0.40	70.00	SDL
	Draft offer letter to Mr. Berman regarding settlement & deadline for response before hearing per client's instructions.	0.70	122.50	SDL
	Review deposition transcript of Mr. Ji; outline for trial questions.	3.50	612.50	SDL
Mar-05-03	Phone call from Ms. Valle regarding clarification of written settlement offer.	0.30	52.50	SDL

Mar-06-03	Phone call with Ms. Salas regarding settlement offer status.	0.30	52.50	SDL
	Draft Exhibit list from documents in file.	0.50	87.50	SDL
	Draft Witness List for filing by 3/14/03.	0.50	87.50	SDL
	Review Complaint, notes, deposition transcript for Pre-Trial memorandum factual arguments.	2.70	472.50	SDL
Mar-07-03	Review chronology of service, default request, continuances, etc. for response to defense Motion to Withdraw as counsel.	1.00	175.00	SDL
Mar-10-03	Draft response to defense Motion to Withdraw counsel.	0.40	70.00	SDL
Mar-11-03	Attend court hearing on defense motion to withdraw.	0.70	122.50	SDL
	Review defense Motion to Withdraw; court's Order re: hearing.	0.20	35.00	SDL
	Phone call with client after hearing.	0.10	17.50	SDL
	Meeting with client re: settlement.	0.40	70.00	SDL
	Draft Affidavit from notes of meeting with client.	0.50	87.50	SDL
	Totals	79.05	\$13,833.75	

**DISBURSEMENTS****Disbursements****Receipts**

Feb-06-02	Filing Fee	150.00
Feb-12-02	Courier Expense re: DHL Inv#0008552316	26.58
	Process Service to James Ji re: DC appt / Salas.	55.00
Feb-14-02	Postage Sent to Professional Process Service	0.34
Apr-30-02	Photocopies (42 copies @ \$0.25 ea)	10.50
	Photocopies (6 @ \$0.25 ea)	1.50
May-17-02	Postage Sent to Mr. James Ji	0.57
Oct-01-02	Postage Expense re: Monica Valle, Esq.	0.37
Nov-22-02	Deposition of Alice N. Salas (provided by: DepoResources)	197.20
Mar-11-03	Postage sent to Daniel j. Berman, Esq.	0.37

Totals	\$442.43	\$0.00
<b>Gross Receipts Tax</b>		<b>\$0.00</b>
 <b>Total Fees &amp; Disbursements</b>		 <b>\$14,276.18</b>
 Previous Balance		 \$0.00
Previous Payments		\$0.00
 <b>Balance Due Now</b>		 <b>\$14,276.18</b>